

Food and Drug Administration 10903 New Hampshire Avenue Document Control Center – WO66-G609 Silver Spring, MD 20993-0002

June 24, 2015

Centinel Spine, Incorporated % Mr. Justin Eggleton Director, Spine Regulatory Affairs Musculoskeletal Clinical Regulatory Advisers, LLC 1331 H Street Northwest, 12th Floor Washington, District of Columbia 20005

Re: K150053

Trade/Device Name: STALIF C® and STALIF C-TiTM

Regulation Number: 21 CFR 888.3080

Regulation Name: Intervertebral body fusion device

Regulatory Class: Class II

Product Code: OVE Dated: June 1, 2015 Received: June 2, 2015

Dear Mr. Eggleton:

We have reviewed your Section 510(k) premarket notification of intent to market the device referenced above and have determined the device is substantially equivalent (for the indications for use stated in the enclosure) to legally marketed predicate devices marketed in interstate commerce prior to May 28, 1976, the enactment date of the Medical Device Amendments, or to devices that have been reclassified in accordance with the provisions of the Federal Food, Drug, and Cosmetic Act (Act) that do not require approval of a premarket approval application (PMA). You may, therefore, market the device, subject to the general controls provisions of the Act. The general controls provisions of the Act include requirements for annual registration, listing of devices, good manufacturing practice, labeling, and prohibitions against misbranding and adulteration. Please note: CDRH does not evaluate information related to contract liability warranties. We remind you, however, that device labeling must be truthful and not misleading.

If your device is classified (see above) into either class II (Special Controls) or class III (PMA), it may be subject to additional controls. Existing major regulations affecting your device can be found in the Code of Federal Regulations, Title 21, Parts 800 to 898. In addition, FDA may publish further announcements concerning your device in the <u>Federal Register</u>.

Please be advised that FDA's issuance of a substantial equivalence determination does not mean that FDA has made a determination that your device complies with other requirements of the Act or any Federal statutes and regulations administered by other Federal agencies. You must comply with all the Act's requirements, including, but not limited to: registration and listing (21 CFR Part 807); labeling (21 CFR Part 801); medical device reporting (reporting of medical device-related adverse events) (21 CFR 803); good manufacturing practice requirements as set

forth in the quality systems (QS) regulation (21 CFR Part 820); and if applicable, the electronic product radiation control provisions (Sections 531-542 of the Act); 21 CFR 1000-1050.

If you desire specific advice for your device on our labeling regulation (21 CFR Part 801), please contact the Division of Industry and Consumer Education at its toll-free number (800) 638-2041 or (301) 796-7100 or at its Internet address

http://www.fda.gov/MedicalDevices/ResourcesforYou/Industry/default.htm. Also, please note the regulation entitled, "Misbranding by reference to premarket notification" (21CFR Part 807.97). For questions regarding the reporting of adverse events under the MDR regulation (21 CFR Part 803), please go to

<u>http://www.fda.gov/MedicalDevices/Safety/ReportaProblem/default.htm</u> for the CDRH's Office of Surveillance and Biometrics/Division of Postmarket Surveillance.

You may obtain other general information on your responsibilities under the Act from the Division of Industry and Consumer Education at its toll-free number (800) 638-2041 or (301) 796-7100 or at its Internet address

http://www.fda.gov/MedicalDevices/ResourcesforYou/Industry/default.htm.

Sincerely yours,

Mark N. Melkerson -S

Mark N. Melkerson Director Division of Orthopedic Devices Office of Device Evaluation Center for Devices and Radiological Health

Enclosure

DEPARTMENT OF HEALTH AND HUMAN SERVICES Food and Drug Administration

Indications for Use

Form Approved: OMB No. 0910-0120 Expiration Date: January 31, 2017

See PRA Statement below.

510(k) Number (if known)	K150053
K150053	Page 1 of 1
Device Name STALIF C® and STALIF C-Ti TM	
Indications for Use (Describe)	
The STALIF C® and STALIF C-Ti TM devices are intended to be used as standalone system used with bone screws provided and requires no additionserted between the vertebral bodies into the disc space at one or two co C7/T1 disc space for the treatment of cervical degenerative disc disease (degeneration of the disc confirmed by history and radiographic studies). The autograft bone and/or allogenic bone graft composed of cancellous and/or fusion. STALIF C® and STALIF C-Ti TM are intended to be used at one of the confirmed by the state of the confirmed by the state of the confirmed by the state of the confirmed by	ional supplementary fixation systems. It is ontiguous levels from the C2/C3 disc space to the (defined as neck pain of discogenic origin with The device system is designed for use with or corticocancellous bone graft, to facilitate
The cervical cage is to be used in a skeletally mature patient who has had implantation of the cage.	l six weeks of non-operative treatment prior to
Type of Use (Select one or both, as applicable)	
☐ Prescription Use (Part 21 CFR 801 Subpart D)	er-The-Counter Use (21 CFR 801 Subpart C)

PLEASE DO NOT WRITE BELOW THIS LINE - CONTINUE ON A SEPARATE PAGE IF NEEDED.

FOR FDA USE ONLY

Concurrence of Center for Devices and Radiological Health (CDRH) (Signature)

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K150053

510(k) Summary

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Device Trade Name: STALIF C® and STALIF C-TiTM

Manufacturer: Centinel Spine, Inc.

900 Airport Road, Suite 3B West Chester, PA 19380

Contact: Mr. John Parry

Development Manager Phone: (484) 887.8813

Prepared by: Mr. Justin Eggleton

Musculoskeletal Clinical Regulatory Advisers, LLC

1331 H Street NW, 12th Floor

Washington, DC 20005 Phone: (202) 552-5800 jeggleton@mcra.com

Date Prepared: June 22, 2015

Classifications: 21 CFR §888.3080, Intervertebral body fusion device

Class:

Product Codes: OVE

Primary Predicate: K142079, STALIF C®, STALIF C-TiTM

Reference Device: K142264, Amedica Valeo® Cage

Indications For Use:

The STALIF C® and STALIF C-TiTM devices are intended to be used as an intervertebral body fusion cage as a standalone system used with bone screws provided and requires no additional supplementary fixation systems. It is inserted between the vertebral bodies into the disc space at one or two contiguous levels from the C2/C3 disc space to the C7/T1 disc space for the treatment of cervical degenerative disc disease (defined as neck pain of discogenic origin with degeneration of the disc confirmed by history and radiographic studies). The device system is designed for use with autograft bone and/or allogenic bone graft composed of cancellous and/or corticocancellous bone graft, to facilitate fusion.

The cervical cage is to be used in a skeletally mature patient who has had six weeks of non-operative treatment prior to implantation of the cage.

Summary of Technological Characteristics:

STALIF C® is a radiolucent intervertebral body fusion cage with unicortical cancellous bone screws. It is intended to be used as an IBF cage without supplementary fixation. The cross section profile of the STALIF C® is similar to that of the vertebral body endplate with central cavity that can be packed with autograft or allograft. STALIF C® is manufactured from either PEEK-OPTIMA® LT1 supplied by Invibio or Zeniva ZA PEEK supplied by Solvay per ASTM F2026 with titanium alloy screws (Ti6Al4V, ASTM F136) and X-ray marker wires manufactured from unalloyed Tantalum (ASTM F560). The STALIF C-TiTM is identical to this design with a titanium plasma spray coating (CPTi per ASTM F1580) on the device endplates.

The purpose of the subject 510(k) was to expand the indications to allow for use in multilevel procedures (i.e., two contiguous levels).

Predicate Device:

The subject STALIF C® and STALIF C-TiTM intervertebral body fusion devices are substantially equivalent to predicate STALIF C® and STALIF C-TiTM (K142079) with respect to indications, design, function, and materials.

Substantial Equivalence:

STALIF C®, STALIF C-TiTM and predicate STALIF C®, STALIF C-TiTM devices are identical in design, material, and performance. A comprehensive clinical literature review was conducted to assess any additional safety concern for the use of this device (accounting for its integrated fixation features) at two cervical levels.

Performance Testing:

A comprehensive, clinical literature review and PearlDiver reimbursement data have been provided to investigate the risks and benefits associated with the use of the STALIF C® devices in multilevel cervical procedures. Additionally, cadaveric biomechanical testing was conducted to support substantial equivalence.

Conclusion:

The Centinel Spine STALIF C® and STALIF C-TiTM have been modified to expand the indications to permit use in multilevel cervical procedures (i.e., one or two contiguous levels). The 510(k) demonstrates substantial equivalence to predicate devices.